

## Risk register

N0.	Date raised	Opportunity/risk description (opportunities shaded in blue)	Type	Theme	Probability (1 low, 5 high)	Impact (1 low, 5 high)	Overall priority (1 low, 25 high)	Direction	Proximity	Strategic	Actions required	Owner	Interested steering groups / SLT	Last updated
1	30/06/17	Opportunity to develop the culture of the ICO alongside changes in our processes.	Internal	People	4.0	5.0	20.0	Same ↔	Medium term	Strategic	Range of People projects underway intended to mitigate strategic people risks. Progress reported to Change Board, SLT and MB.	SLT: Elizabeth Denham	All SGs	04/04/18
2	13/04/18	ICO fails to deal with issues arising from Operation Cederberg in a timely and effective way; and hence does not meet the wide range of expectations of stakeholders.	Internal/ External	Reputation	4.0	5.0	20.0	New	Medium term	Strategic	Planning in train to increase resources on the operation. We are also taking senior direction to the investigation and pursuing thorough lines of enquiry.	SLT: James Dipple-Johnstone	Ops SG	13/04/18
3	01/04/17	There is an opportunity to shape the DP regime by influencing government and international opinion.	Strategic	Policy	4.0	4.0	16.0	Up ↑	Short term	Strategic	Providing support to DCMS to ensure that legislative changes are made including working on new powers to possibly be introduced at report stage of the Data Protection Bill and generally monitoring passage of the Bill. ICO has also set up an EU withdrawal planning group.	SLT: Elizabeth Denham	Policy SG	16/04/18
4	01/04/17	Risk of insufficient resources to match demand for our services, especially during the relative uncertainty as we transition to a new regulatory regime	Internal	Ops	4.0	4.0	16.0	Up ↑	Short term	Strategic	Review and refine projections and close monitoring of actual demand. Planning for tackling contact centre backlog being undertaken and resources for Operation Cederberg being considered; to include raising the question of financial resources with Ministers if needed.	SLT: James Dipple-Johnstone	Ops SG	16/04/18
6	28/06/17	ICO fails to meet expectations when dealing with priority files in a timely and effective way; and hence does not meet the wide range of expectations of stakeholders.	Internal/ External	Reputation	4.0	4.0	16.0	Up ↑	Medium term	Strategic	Process for handling priority cases agreed and SLT has monthly oversight of this process and the progress of cases.	SLT: James Dipple-Johnstone	Ops/ Policy SG	04/04/18
7	26/01/18	Uncertainty around the legal framework for data protection and the ICO's role in EDPB following withdrawal from the EU.	External	Legal	4.0	3.0	12.0	Same ↔	Medium term	Strategic	EU withdrawal planning group set up. Position paper on EDPB / ICO developed.	SLT: Steve Wood	Policy SG	26/01/18
8	10/05/17	The ICO is seen as not being relevant to information rights issues by its stakeholders (the public, media, gov etc) in policy areas, engagement and the delivery of robust enforcement action, and hence loses influence.	Internal/ External	Reputation	3.0	4.0	12.0	Same ↔	Medium term	Strategic	International Strategy and Technology strategies developed. Parliamentary and Gov Engagement Strategy is in the process of being developed. The Information Rights Strategic Plan is being updated. SLT has direct oversight of guidance production with some guidance being outsourced and an SME focus to some comms work.	SLT: Elizabeth Denham	Ops/ Policy SG	04/04/18
13	05/05/17	That, as the skills of ICO staff are in high demand, we see an increase in staff turnover, either organisation wide or in discrete teams or departments, which has a detrimental impact on the capacity and capability of the organisation.	Internal/ External	People	3.0	3.0	9.0	Same ↔	Short term	Strategic	Range of People projects underway to mitigate strategic people risks. Progress reported to Change Board, SLT and MB. Implementation of pay systems review in response to successful outcome of pay case including payment of initial pay rises from 1 April.	SLT: Paul Arnold	All SGs	04/04/18
15	29/06/17	The ICO GDPR change programme is not delivered to time to scope or within budget	Internal	Reputation	2.0	4.0	8.0	Same ↔	Short term	Strategic	Change programme in place mitigating risk on an ongoing basis and overseen by SLT.	SLT: Paul Arnold	Change Board	29/06/17

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16	05/05/17	That we fail to recruit the right people with the right skills into the most important roles to enable the ICO to prepare for wider EU data protection reforms.	Internal/ External	People	2.0	4.0	8.0	Same ↔	Short term	Strategic	Range of People projects intended to mitigate strategic people risks. Progress reported to Change Board, SLT and MB. Implementation of pay systems review in response to successful outcome of pay case including initial payment of initial pay rises from 1 April. Also considering the grading of technical investigator roles to position them at a more senior level.	SLT: Paul Arnold	DCEO SG	16/04/18
17	05/05/17	The ICO may have insufficient funds to meet business needs following the implementation of GDPR.	Internal	Finances	2.0	4.0	8.0	Up ↑	Short term	Strategic	Fee raising power confirmed in Digital Economy Act. SI has now received Treasury approval. Implementation date moved to 25th of May. Discussions ongoing with DCMS regarding the penalty regime for non payment.	SLT: Paul Arnold	DCEO SG	16/04/18
21	01/04/17	Cyber defences are not sufficiently robust because the IT environment is not maintained to the required standard, security and integrity.	External	IT	2.0	3.0	6.0	Same ↔	Medium term	Strategic	Long standing compliance with PSM combined with regular programme of IT health check/penetration tests . Working towards ISO 27001 compliance.	SLT: Paul Arnold	DCEO SG	16/04/18
22	24/07/17	An increasing number of regulators, some with remits related to that of the ICO, results in a lack of clarity and reduced visibility of the ICO's role	External	Reputation	2.0	3.0	6.0	Same ↔	Medium term	Strategic	Ongoing liaison with DCMS, other government departments and other regulators.	SLT: Elizabeth Denham	Ops/ Policy SG	16/04/18
23	05/05/17	As the ICO's fee income arrangements change our registration service is not equipped to cope and as a result the collection of the ICO's fee income is placed at risk.	Major Project	Finances	2.0	3.0	6.0	Same ↔	Short term	Strategic	We will maintain 100% follow up of data controllers who cease to renew registration and have produced external communications to make clear the need to renew each year. Our project team is developing the processes and technology to implement new fee income collection service based on the future funding model.	SLT: Paul Arnold	DCEO SG	13/10/17
25	01/04/17	Ability of the ICO to spot emerging technological issues and to stay on top of them as they develop.	Internal	Policy	2.0	3.0	6.0	Same ↔	Medium term	Strategic	Technology Strategy developed and Head of Technology Policy recruited.	SLT: Steve Wood	All SGs	21/12/17
26	05/05/17	That we fail to take the opportunity to lead and support all ICO staff to own and develop their individual capability and to maximise their personal contribution to our strategic goals and priorities.	Internal	People	2.0	3.0	6.0	Same ↔	Long term	Strategic	Range of People projects underway intended to mitigate strategic people risks. Progress reported to Change Board, SLT and MB.	SLT: Paul Arnold	DCEO SG	25/01/18
27	31/08/17	Poor industrial relations may impair engagement between ICO management and its workforce, leading to sub-optimum productivity and reduced ability to deliver change.	Internal	People	3.0	2.0	6.0	Same ↔	Medium term	Strategic	Regular Joint Committee meetings between TUS and Management. Regular senior level engagement with trade unions during pay case discussion. Implementation of first stage of the pay negotiations in April.	SLT: Paul Arnold	DCEO SG	16/04/18
28	23/02/18	The ICO fails to develop new, and maintain existing, workforce capability in line with the organisational priorities.	Internal	People	2.0	3.0	6.0	Same ↔	Medium term	Strategic	Recruitment of Head of Workforce Planning and ongoing work on developing a coaching management culture and resourcing learning and development activities.	SLT: Paul Arnold	DCEO SG	27/02/18

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29	26/01/18	The new DPA raises unexpected demands on the ICO that are difficult to meet, or creates unintended regulatory consequences.	External	Legal	3.0	2.0	6.0	Same ↔	Medium term	Strategic	Shadow DP Bill team, outsourced legal advice on DP Bill and close liaison with DCMS Bill team.	SLT: Steve Wood	Policy SG	27/02/18
30	10/05/17	Amendments to UK legislation, needed because of GDPR and the LED, are too late to allow the ICO, as regulator, or the regulated sector, to adequately plan and prepare for implementation.	External	Policy	2.0	3.0	6.0	Same ↔	Short term	Strategic	Providing support to DCMS to ensure that legislative changes are made. Monitoring passage of the Data Protection Bill.	SLT: Steve Wood	Policy SG	04/04/18
34	05/05/17	That we do not have sufficient space to accommodate our expanding workforce.	Internal	People	1.0	2.0	2.0	Same ↔	Medium term	Strategic	King's Court accommodation increases Wilmslow accommodation by 20-25%. Continuing to explore ways of best utilising ICO space in general as well as in the new space.	SLT: Paul Arnold	DCEO SG	16/02/18

